



**BELOVED  
St. JOHN**  
EVANGELISTIC CHURCH

4541 North Broad Street (at Belfield Avenue)  
Philadelphia, PA 19140

*CGB-CC-0562*  
**Received & Inspected**  
**JAN 13 2012**

**FCC Mail Room**

**Office: (215) 329-5140**  
**Fax: (215) 329-5167**

**Rev. Clement M. Lupton, III**  
*Senior Pastor*

January 11, 2012

Office of the Secretary  
Federal Communications Commission  
Attention: Disability Rights Office, Room 3-B431  
9300 East Hampton Drive  
Capitol Heights, MD 20743

**Case Identifier: CGB-CC-0562**

Dear Sir/Madam,

We are writing to seek exemption from the closed captioned requirements. "Time of Decision" is aired locally weekdays by Global Media Productions Ministry on ION Media Networks. The purpose of this petition is to request an exemption from the Closed Captioning Requirements, under Section 79.1 of the Commission's rules, 47 C.F.R. and 79.1. Global Media Productions Ministry believes that our program qualifies for exemption for the following reasons:

**1. Part 79.1 - Section D:**

"Time of Decision" is a locally produced and distributed non-news program. The program is of local public interest basically to give into the community around their churches, and is not news programs.

**2. Part 79.1 - Section F:**

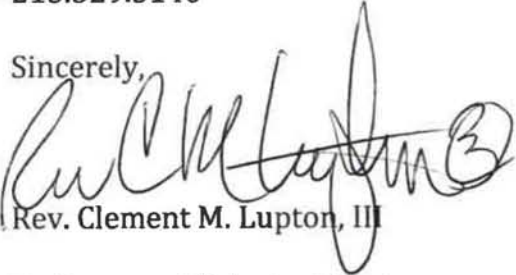
Compliance would impose an undue burden to our church for the following reasons:

- (a) It would be necessary to send the programs to an outside source for captioning. This would impact meeting airdate deadlines and the added production cost would make production unaffordable.
- (b) Our church program would have to discontinue and Global Media Productions Ministry will have to drop their airtime.
- (c) Our church as well as Global Media Productions Ministry is non-profit organizations. Our church is donor supported and the added cost would be an undue burden.
- (d) Beloved St. John Evangelistic Church's total income for all sources is \$1,405,746.80 per year.

Again, we respectfully request that these programs be exempted from the closed captioned requirement for the above stated reasons. I can be reached at:

Beloved St. John Evangelistic Church  
Attn: Rev. Clement M. Lupton, III  
4541 North Broad Street  
Philadelphia, PA 19140  
215.329.5140

Sincerely,

A handwritten signature in black ink, appearing to read "Rev. Clement M. Lupton, III", with a large, stylized flourish at the end.

Rev. Clement M. Lupton, III

Enclosure: Affidavit of Costs



BELOVED  
**St. JOHN**  
EVANGELISTIC CHURCH

Received & Inspected

JAN 13 2012

FCC Mail Room

4541 North Broad Street (at Belfield Avenue)  
Philadelphia, PA 19140

Office: (215) 329-5140

Fax: (215) 329-5167

**Rev. Clement M. Lupton, III**  
Senior Pastor

Affidavit of Costs

I, Clement M. Lupton III, Senior Pastor of Beloved St. John Evangelistic Church, by my signature affixed to this document, do hereby make the following statement of fact and affirm:

1. Total income of Beloved St. John Evangelistic Church, including all sources, \$1,405,746.80 yearly (September 2010 through September 2011).
2. The amount paid to ION Media Networks Television for the weekday broadcast is \$3,612.50 per week, \$187,850.00 yearly. Additionally, \$72,053.05 per year is paid to Global Media Productions Ministry for taping. Total expenditure for our broadcast is \$259,903.05 yearly.
3. All other costs involved in the production and distribution of the TV Broadcast is performed by me and members of the church as volunteers with no charge.
4. Captioning costs would average \$225.00 per program, \$58,725.00 per year if out-sourced. This cost far exceeds any of our in-house production costs, equipment and supplies, and could be a real deterrent in our ability to deliver a quality product to the public.

**NOTE: Quotes received are attached. Lowest quote is considered in this affidavit.**

I now affix my signature to these affirmations:

Clement M. Lupton, III  
Senior Pastor

The foregoing was subscribed and worn to me, a Notary Public, of the State of Pennsylvania, County of Philadelphia this 11<sup>th</sup> day of January 2012.

Notary Public

NOTARIAL SEAL  
Roblyn Davis  
NOTARY PUBLIC  
City of Philadelphia, Philadelphia County  
My Commission Expires 06/22/2014



**Beloved Saint John Evangelistic Church**  
**Statement of Activities**  
**For the Three Months and Twelve Months Ended December 31, 2010**

|   | <b>Three Months Ended<br/>December 31, 2010</b> | <b>%</b>      |
|---|---|---------------|
| <b>Income</b>                               |   |               |
| Tithes, Gifts & Offerings                   | \$ 231,165.83                                   | 61.97         |
| Missions Offerings                          | 1,353.04  | 0.36          |
| Benevolence                                 | 17,897.46                                       | 4.80          |
| Afternoon Service                           | 7,503.94  | 2.01          |
| Sunday School                               | 1,708.73  | 0.46          |
| Prayer Meeting                              | 13,017.76                                       | 3.49          |
| Tape Ministry                               | 1,753.03  | 0.47          |
| Book Ministry                               | 0.00  | 0.00          |
| Women's Fellowship                          | 2,195.25  | 0.59          |
| Children's Workshop                         | 147.39  | 0.04          |
| Men's Fellowship                            | 31.00   | 0.01          |
| Christian Education                         | 416.00  | 0.11          |
| Retreats                                    | 1,635.00  | 0.44          |
| Youth Service                               | 578.99  | 0.16          |
| Revivals                                    | 3,260.31  | 0.87          |
| Miscellaneous                               | 3,040.67  | 0.82          |
| TV/Radio                                    | 6,064.50  | 1.63          |
| Mortgage campaign                           | <u>81,242.53</u>                                | <u>21.78</u>  |
| <b>Total Tithes, Gifts, &amp; Offerings</b> | <u>373,011.43</u>                               | <u>100.00</u> |
| <b>Direct Expenses</b>                      |   |               |
| Outreach                                    | 1,489.00  | 0.40          |
| Love Offerings                              | 29,347.46                                       | 7.87          |
| Missions                                    | 1,000.00  | 0.27          |
| Curriculum/Books Expense                    | 967.55  | 0.26          |
| Service Supplies                            | 5,924.31  | 1.59          |
| Music Honorariums                           | 200.00  | 0.05          |
| Honorariums                                 | 6,003.00  | 1.61          |
| Radio Broadcasts                            | 2,666.00  | 0.71          |
| Youth Ministry                              | 0.00  | 0.00          |
| Children's Church                           | 0.00  | 0.00          |
| Vacation Bible School                       | 0.00  | 0.00          |
| Audio Supplies                              | 2,651.76  | 0.71          |
| Women's Fellowship                          | 0.00  | 0.00          |
| Men's Fellowship                            | 550.00  | 0.15          |
| Christian Education                         | 0.00  | 0.00          |
| Music Dept. Expense                         | 759.99  | 0.20          |
| Miscellaneous Fellowship                    | 176.15  | 0.05          |
| Outreach Expense                            | 0.00  | 0.00          |
| Conferences                                 | 4,135.38  | 1.11          |
| Retreat                                     | 2,270.00  | 0.61          |
| TV Broadcast                                | <u>62,202.75</u>                                | <u>16.68</u>  |
| <b>Total Direct Expenses</b>                | <u>120,343.35</u>                               | <u>32.26</u>  |

**Received & Inspected**

**JAN 11 2012**

**FCC Mail Room**

See Accountants' Compilation Report

**Beloved Saint John Evangelistic Church**  
**Statement of Activities**  
**For the Three Months and Twelve Months Ended December 31, 2010**

|                                    | <b>Three Months Ended<br/>December 31, 2010</b> | <b>%</b>           |
|------------------------------------|---|--------------------|
| <b>Gross Margin</b>                | <u>252,688.08</u>                               | <u>67.74</u>       |
| <b>Operating Expenses</b>          |   |                    |
| Benevolent Expense                 | 0.00  | 0.00               |
| Anniversary Celebration            | 0.00  | 0.00               |
| Operating Supplies                 | (1,251.27)                                      | (0.34)             |
| Freight and Postage                | 624.16  | 0.17               |
| Clerical Help                      | 0.00  | 0.00               |
| Pastor's Compensation              | 32,368.00                                       | 8.68               |
| Wages                              | 70,162.30                                       | 18.81              |
| Housing Allowance                  | 21,532.00                                       | 5.77               |
| Pastor's Expense                   | 6,568.42  | 1.76               |
| Warehouse Rental                   | 378.00  | 0.10               |
| Rent                               | 0.00  | 0.00               |
| Utilities                          | 6,370.36  | 1.71               |
| Telephone                          | 6,084.74  | 1.63               |
| Repairs and Maintenance            | 6,627.82  | 1.78               |
| Security Expense                   | 2,109.12  | 0.57               |
| donations                          | 0.00  | 0.00               |
| Entertainment                      | 0.00  | 0.00               |
| Advertising                        | 2,469.00  | 0.68               |
| Insurance                          | 5,728.98  | 1.54               |
| Health Insurance                   | 17,106.83                                       | 4.59               |
| FICA Tax Expense                   | 5,336.68  | 1.43               |
| Interest Expense                   | (3,535.29)                                      | (0.95)             |
| Vehicle Expense                    | 426.60  | 0.11               |
| Professional Fees                  | 450.00  | 0.12               |
| Office Expense                     | 8,459.97  | 2.27               |
| Dues, Subscriptions & Memberships  | 49.00   | 0.01               |
| Christmas expenses                 | 2,225.00  | 0.60               |
| Miscellaneous Expenses             | <u>0.00</u>                                     | <u>0.00</u>        |
| <b>Total Operating Expenses</b>    | <u>190,290.42</u>                               | <u>51.01</u>       |
| <b>Revenue Over (Expenses)</b>     | <u>62,377.66</u>                                | <u>16.72</u>       |
| <b>Other Income</b>                |   |                    |
| Interest Income                    | <u>83.37</u>                                    | <u>0.02</u>        |
| <b>Total Other Income</b>          | <u>83.37</u>                                    | <u>0.02</u>        |
| <b>Other Expenses</b>              |   |                    |
| Depreciation                       | 51,372.00                                       | 13.77              |
| <b>Net Revenue Over (Expenses)</b> | <u><u>\$ 11,089.03</u></u>                      | <u><u>2.97</u></u> |

See Accountants' Compilation Report

JAN 10 2012

FCC Mail Room

**Beloved Saint John Evangelistic Church**  
**Statement of Activities**  
**For the Three Months and Nine Months Ended September 30, 2011**

|   | Three Months Ended<br>September 30, 2011 |                   | %             | Nine Months Ended<br>September 30, 2011 |                     | %             |
|---|--|-------------------|---------------|---|---------------------|---------------|
| <b>Income</b>                               |  |                   |               |   |                     |               |
| Tithes, Gifts & Offerings                   | \$                                       | 230,304.39        | 69.47         | \$                                      | 749,283.21          | 72.55         |
| Missions Offerings                          |  | 2,492.04          | 0.75          |   | 7,076.64            | 0.69          |
| Benevolence                                 |  | 18,031.88         | 5.44          |   | 61,857.77           | 5.99          |
| Afternoon Service                           |  | 3,970.45          | 1.20          |   | 18,415.12           | 1.78          |
| Sunday School                               |  | 788.78            | 0.24          |   | 4,054.43            | 0.39          |
| Prayer Meeting                              |  | 33,781.21         | 10.19         |   | 59,956.14           | 5.81          |
| Tape Ministry                               |  | 1,965.00          | 0.59          |   | 6,584.25            | 0.64          |
| Book Ministry                               |  | 0.00              | 0.00          |   | 160.00              | 0.02          |
| Women's Fellowship                          |  | 0.00              | 0.00          |   | 5,471.91            | 0.53          |
| Children's Workshop                         |  | 102.30            | 0.03          |   | 406.51              | 0.04          |
| Men's Fellowship                            |  | 20.00             | 0.01          |   | 898.51              | 0.09          |
| Christian Education                         |  | 1,620.50          | 0.49          |   | 8,608.69            | 0.83          |
| Retreats                                    |  | 0.00              | 0.00          |   | 3,138.00            | 0.30          |
| Vacation Bible School                       |  | 1,886.00          | 0.57          |   | 3,803.00            | 0.37          |
| Youth Service                               |  | 794.06            | 0.24          |   | 1,170.26            | 0.11          |
| Revivals                                    |  | 0.00              | 0.00          |   | 14,027.69           | 1.36          |
| Miscellaneous                               |  | 3,267.00          | 0.99          |   | 12,253.09           | 1.19          |
| Music Revenue                               |  | 0.00              | 0.00          |   | 1,056.88            | 0.10          |
| TV/Radio                                    |  | 6,311.00          | 1.90          |   | 21,458.17           | 2.08          |
| Anniversary Celebration                     |  | 22,603.00         | 6.82          |   | 39,043.00           | 3.78          |
| Mortgage campaign                           |  | 3,592.50          | 1.08          |   | 14,012.10           | 1.36          |
| <b>Total Tithes, Gifts, &amp; Offerings</b> |  | <b>331,530.11</b> | <b>100.00</b> |   | <b>1,032,735.37</b> | <b>100.00</b> |
| <b>Direct Expenses</b>                      |  |                   |               |   |                     |               |
| Love Offerings                              |  | 29,772.81         | 8.98          |   | 96,397.70           | 9.33          |
| Missions                                    |  | 500.00            | 0.15          |   | 3,500.00            | 0.34          |
| Curriculum/Books Expense                    |  | 1,632.91          | 0.49          |   | 3,937.19            | 0.38          |
| Service Supplies                            |  | 6,963.73          | 2.10          |   | 17,696.33           | 1.71          |
| Music Honorariums                           |  | 250.00            | 0.08          |   | 450.00              | 0.04          |
| Honorariums                                 |  | 3,300.00          | 1.00          |   | 7,050.00            | 0.68          |
| Radio Broadcasts                            |  | 4,092.00          | 1.23          |   | 12,152.00           | 1.18          |
| Youth Ministry                              |  | 0.00              | 0.00          |   | 360.00              | 0.03          |
| Children's Church                           |  | 219.37            | 0.07          |   | 219.37              | 0.02          |
| Vacation Bible School                       |  | 76.73             | 0.02          |   | 200.36              | 0.02          |
| Audio Supplies                              |  | 3,173.64          | 0.96          |   | 4,789.35            | 0.46          |
| Women's Fellowship                          |  | 0.00              | 0.00          |   | 2,708.10            | 0.26          |
| Men's Fellowship                            |  | 0.00              | 0.00          |   | 300.00              | 0.03          |
| Christian Education                         |  | 0.00              | 0.00          |   | 124.45              | 0.01          |
| Music Dept. Expense                         |  | 415.98            | 0.13          |   | 627.98              | 0.06          |
| Miscellaneous Fellowship                    |  | 1,885.00          | 0.57          |   | 3,535.00            | 0.34          |
| Outreach Expense                            |  | 0.00              | 0.00          |   | 569.45              | 0.06          |
| Conferences                                 |  | 500.00            | 0.15          |   | 1,000.00            | 0.10          |
| Retreat                                     |  | 0.00              | 0.00          |   | 4,373.00            | 0.42          |
| TV Broadcast                                |  | 61,476.85         | 18.54         |   | 186,133.71          | 18.02         |

See Accountants' Compilation Report



**Beloved Saint John Evangelistic Church**  
**Statement of Activities**  
**For the Three Months and Nine Months Ended September 30, 2011**

|                                    | Three Months Ended<br>September 30, 2011 | %             | Nine Months Ended<br>September 30, 2011 | %            |
|------------------------------------|--|---------------|---|--------------|
| <b>Total Direct Expenses</b>       | <u>114,259.02</u>                        | <u>34.46</u>  | <u>346,123.99</u>                       | <u>33.52</u> |
| <b>Gross Margin</b>                | <u>217,271.09</u>                        | <u>65.54</u>  | <u>686,611.38</u>                       | <u>66.48</u> |
| <b>Operating Expenses</b>          |  |               |   |              |
| Benevolent Expense                 | 4,100.00                                 | 1.24          | 7,755.00                                | 0.75         |
| Anniversary Celebration            | 15,864.00                                | 4.79          | 24,247.30                               | 2.35         |
| Outside Services                   | 0.00                                     | 0.00          | 145.00                                  | 0.01         |
| Operating Supplies                 | 1,155.47                                 | 0.35          | 4,342.13                                | 0.42         |
| Freight and Postage                | 638.47                                   | 0.19          | 1,564.26                                | 0.15         |
| Pastor's Compensation              | 30,056.00                                | 9.07          | 90,168.00                               | 8.73         |
| Wages                              | 70,827.76                                | 21.36         | 204,261.34                              | 19.78        |
| Housing Allowance                  | 19,994.00                                | 6.03          | 59,982.00                               | 5.81         |
| Pastor's Expense                   | 7,570.17                                 | 2.28          | 18,291.96                               | 1.77         |
| Warehouse Rental                   | 281.00                                   | 0.08          | 911.00                                  | 0.09         |
| Rent                               | 155.00                                   | 0.05          | 281.00                                  | 0.03         |
| Utilities                          | 13,460.28                                | 4.06          | 42,063.08                               | 4.07         |
| Telephone                          | 3,143.64                                 | 0.95          | 11,188.66                               | 1.08         |
| Repairs and Maintenance            | 14,921.54                                | 4.50          | 36,210.46                               | 3.51         |
| Security Expense                   | 382.49                                   | 0.12          | 7,602.09                                | 0.74         |
| donations                          | 0.00                                     | 0.00          | 1,100.00                                | 0.11         |
| Advertising                        | 5,813.75                                 | 1.75          | 10,771.00                               | 1.04         |
| Insurance                          | 6,484.75                                 | 1.96          | 17,034.16                               | 1.65         |
| Health Insurance                   | 15,288.48                                | 4.61          | 46,529.88                               | 4.51         |
| Travel                             | 150.00                                   | 0.05          | 150.00                                  | 0.01         |
| Business Meetings                  | 0.00                                     | 0.00          | 100.00                                  | 0.01         |
| FICA Tax Expense                   | 5,358.54                                 | 1.62          | 15,546.17                               | 1.51         |
| Licenses and Other Permits         | 0.00                                     | 0.00          | 36.00                                   | 0.00         |
| Interest Expense                   | 1,089.21                                 | 0.33          | 2,302.80                                | 0.22         |
| Vehicle Expense                    | 343.41                                   | 0.10          | 1,970.13                                | 0.19         |
| Professional Fees                  | 100.00                                   | 0.03          | 1,000.00                                | 0.10         |
| Office Expense                     | 15,005.93                                | 4.53          | 39,971.92                               | 3.87         |
| Dues, Subscriptions & Memberships  | 150.00                                   | 0.05          | 383.01                                  | 0.04         |
| Miscellaneous Expenses             | 86.61                                    | 0.03          | 86.61                                   | 0.01         |
| <b>Total Operating Expenses</b>    | <u>232,420.50</u>                        | <u>70.11</u>  | <u>645,994.96</u>                       | <u>62.55</u> |
| <b>Revenue Over (Expenses)</b>     | <u>(15,149.41)</u>                       | <u>(4.57)</u> | <u>40,616.42</u>                        | <u>3.93</u>  |
| <b>Other Income</b>                |  |               |   |              |
| Interest Income                    | <u>70.03</u>                             | <u>0.02</u>   | <u>219.57</u>                           | <u>0.02</u>  |
| <b>Total Other Income</b>          | <u>70.03</u>                             | <u>0.02</u>   | <u>219.57</u>                           | <u>0.02</u>  |
| <b>Net Revenue Over (Expenses)</b> | <u>\$ (15,079.38)</u>                    | <u>(4.55)</u> | <u>\$ 40,835.99</u>                     | <u>3.95</u>  |

See Accountants' Compilation Report

REC'D JAN 10 2012

GLOBAL MEDIA PRODUCTIONS  
Conference Center, Inc.  
A Multimedia Worldwide Presentation Center

Received & Inspected

JAN 10 2012

FCC Mail Room

January 10, 2012

To Whom It May Concern,

In order to provide Time of Decision with the service of closed captioning, we would have to subcontract with a closed-captioning company. Closed-captioning companies charge from \$258. and up just for closed captioning one half hour program; a little less than twice the cost of video recording and editing a half hour program. This cost would be passed along to Time of Decision and added to present media costs of production and airtime.

Sincerely,

*Ena Stockton*

Ena Stockton





Computer Prompting & Captioning Co.

1010 Rockville Pike, Suite 306  
Rockville, Maryland 20852-1419, USA  
301-738-8487 • FAX 8488 • TTY 8489  
[info@cpcweb.com](mailto:info@cpcweb.com) • [www.cpcweb.com](http://www.cpcweb.com)

DATE: 01/03/2012  
Fed ID#: 52-1911964

## **PROPOSAL FOR A CAPTIONING SERVICE**

To:  
Linda Evans  
[Levans.bsj@verizon.net](mailto:Levans.bsj@verizon.net)  
215.329.5140

| Qty | Items &<br>Descriptions   | Unit<br>Price per<br>video | Extended<br>Price |
|-----|---|----------------------------|-------------------|
| 1   | 5 Day turnaround - 30 minute video. Transcript and Captioning provided by CPC. SCC file for Adobe Premiere delivered for output to BetaSP | \$285                      | \$285             |
|     |   |                            |                   |
|     | Total   |                            | \$285             |

This proposal is valid for 90 days.  
To place your order please fill out this online order form:

[https://www.cpcweb.com/order/service/service\\_form.html](https://www.cpcweb.com/order/service/service_form.html)

### **Sole Source Declaration**

We are the manufacturer and vendor of all CPC software and hardware. We do not have a dealer network, so there are no official vendors that sell CPC software or hardware.

Prepared by Giovanni Galvez  
(301) 738-8487  
[ggalvez@cpcweb.com](mailto:ggalvez@cpcweb.com)

*For over 25 years, CPC has been meeting the closed captioning needs of thousands of organizations, both large and small. Our captioning software and services bring you the benefits of that long experience. Most importantly, with an unequaled history of captioning software breakthroughs, your CPC software will never become obsolete.*

[Print](#)

Subject: **Closed Captioning with EICBTv**  
From: **Joshua Weiss <cross1@crosstalk.org>**  
Sent: **Jan 4, 2012 04:58:57 PM**  
To: **levans.bsj@verizon.net**  
Reply-To: **josh@crosstalk.org**

---

Hello Linda,

It was nice to speak with you today regarding the closed captioning brochure that was sent to you. I hope that our discussion was helpful and informative. Per our conversation, I wanted to reiterate the information through an email so that you could reference back to everything. Our production company, EICB TV (Excellence In Christian Broadcasting), offers a flat rate CC service. You indicated that your program is a daily half hour program that broadcasts on ION in Philadelphia. The flat rate cost would be \$225 per half hour episode and would include everything from ingesting your program into our computers right down to delivering it to ION through a digital file. If you would like a hard copy dub onto Beta SP or DVCAM, there would only be a minimal \$25 fee per program. We would then ship those programs to ION (or directly to Beloved St. John) either with a shipping account you provide or on our account (we would then just include that expense in the bill). Our turn around time can sometimes be as fast as the same day but we guarantee 7 days.

The \$225 flat rate will include:

Digitizing your program

Transcribing your program

Providing you with a copy of that transcription

Closed Captioning that program

Exporting Digital CC file for your archive

Exporting Digital file of that program for broadcast

If you would like a hard copy dub of the program it is an additional \$25

Shipping costs are billed to client or client's shipping account.

One thing that I did not mention is that we are also a broadcaster. If you have any interest in furthering your programs platform to a greater audience, I'd love to chat with you about that. We own and operate stations around the country as well as a national television network which reaches nearly 50 million households. We also offer local airtime rates for major cities like Dallas, TX. Our prices are extremely competitive and we try to do everything we can to build an ongoing relationship with our clients

I hope all of this is clear. If you have any questions or if I can be of any service to you, please do not hesitate to let me know.

*Joshua D. Weiss*

*Excellence In Christian Broadcasting*

*PO Box 4655 Cedar Hill, TX 75106 USA*

*[www.eicbtv.com](http://www.eicbtv.com)*

*Office 972-293-2566*

*Fax 972-293-2677*

*Cell 469-964-9077*